

**U.S. Department of Justice***United States Attorney**Eastern District of Pennsylvania*

*Louis D. Lappen, FAUSA  
Direct Dial: (215) 861-8551  
Facsimile: (215) 861-8509*

*615 Chestnut Street  
Suite 1250  
Philadelphia, Pennsylvania 19106*

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FILED

OCT 28 2011

U.S. District Court  
Philadelphia, PA  
Clerk

Honorable Jan E. DuBois  
Senior Judge, United States District Court  
12613 United States Courthouse  
601 Market Street  
Philadelphia, PA 19106-1766

**VIA HARD COPY AND FACSIMILE  
TO (215) 580-2141**

Re: *United States v. Ira Pressman*  
*Criminal Case No. 11-cr-319*

Dear Judge DuBois:

I am writing to request a 30-day continuance of the sentencing hearing for Ira Pressman, currently scheduled for November 9, 2011. As your Honor knows, the defendant pled guilty to fraud and money laundering offenses for running a Ponzi scheme in which he defrauded numerous victims out of approximately \$6 million. The government has been working with Lawrence J. Kotler, the attorney representing Lynn E. Feldman, Chapter 7 Trustee for the bankruptcy estates for Ira Pressman and PJI Distribution Corp. to determine the total actual loss in the case, the identity and number of victims, and the amount of restitution owed to each victim. Resolving these issues requires extensive financial analysis of voluminous bank and other records from numerous victims, some of whom are still providing information to the Trustee. This process is underway but has not yet been completed. The government believes that it would be most efficient for this Court and the parties to have all of the sentencing issues decided in one proceeding and have complete information to resolve the financial issues that are central to the sentencing hearing. Thus, additional time is needed for the government to present complete information to this Court.

I have spoken to defense counsel about this matter, and he has stated that the defense opposes this request. Among other concerns, defense counsel has advised me that he has made arrangements for witnesses (some from out of town) to appear on November 9, and that it would be inconvenient for certain witnesses to have to reschedule their appearances. While the government still believes that a continuance is appropriate, if the Court would like to accommodate these witnesses, the government would not object to the Court hearing the testimony of those witnesses on November 9 and continuing the other portion of the sentencing

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Honorable Jan E. DuBois

Senior Judge, United States District Court

Re: United States v. Ira Pressman, Case No.: 11-cr-319

hearing to a later date. In any event, the government believes that it is in the interests of justice that this Court have complete financial information about the defendant's extensive criminal activity before sentencing the defendant, both to fashion an appropriate prison sentence and also to impose restitution. We believe that working as quickly as possible, we would be prepared to go forward with that information in approximately 30 days after November 9.

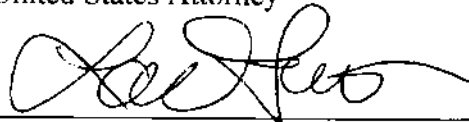
Defense counsel has also advised the government that he intends to present a mental health expert at the time of sentencing. The government has not received a report or summary of his testimony. After receiving this information, the government may need to engage its own expert which will also require some additional time. If we receive the information from counsel soon, the 30-day continuance should suffice.

Finally, the government respectfully requests a telephone conference on this matter so that this continuance request may be resolved as soon as possible. Thank you very much for your Honor's consideration of this matter.

Respectfully,

ZANE DAVID MEMEGER

United States Attorney

A handwritten signature in black ink, appearing to read 'Louis D. Lappen', written over a horizontal line.

Louis D. Lappen

First Assistant United States Attorney

cc: John I. McMahon, Jr., Esq.